

Exhibit P

1	UNITED STATES DISTRICT COURT		
2	WESTERN DISTRICT OF TEXAS		
	SAN ANTONIO DIVISION		
3	LA UNION DEL PUEBLO ENTERO,) (
	ET AL) (
4) (
	VS.) (CASE NO. 5:21-cv-844-XR
5) (
) (
6	GREGORY W. ABBOTT, ET AL) (
7			
	OCA GREATER HOUSTON, ET AL) (
8) (
) (
9	VS.) (CASE NO. 1:21-cv-780-XR
) (
10) (
	JOHN SCOTT, ET AL) (
11			
	HOUSTON JUSTICE, ET AL) (
12) (
) (
13) (
	VS.) (CASE NO. 5:21-cv-848-XR
14) (
) (
15	GREGORY WAYNE ABBOTT, ET AL) (
16			
	LULAC TEXAS, ET AL) (
17) (
) (
18	VS.) (CASE NO. 1:21-cv-0786-XR
) (
19) (
	JOHN SCOTT, ET AL) (
20			
	MI FAMILA VOTA, ET AL) (
21) (
) (
22) (
	VS.) (CASE NO. 5:21-cv-0920-XR
23) (
) (
24	GREG ABBOTT, ET AL) (
25			

1 UNITED STATES OF AMERICA) (
2) (
3 VS.) (CASE NO. 5:21-cv-1085-XR
4) (
5 THE STATE OF TEXAS, ET AL) (
6

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8

9 ORAL DEPOSITION OF

10 JUANITA VALDEZ-COX

11 MARCH 4, 2022
12

13 *****
14

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16 ORAL DEPOSITION OF JUANITA VALDEZ-COX, produced as a
17 witness at the instance of PATRICK K. SWEETEN and duly sworn,
18 was taken in the above-styled and numbered cause on the 4th day
19 of March, 2022, from 10:05 a.m. to 2:58 p.m., before SHANA
20 LIVELY, CSR, RPR, CRR, RMR, in and for the State of Texas,
21 reported by Stenograph, remotely, pursuant to the Texas Rules
22 of Civil Procedure, the current Emergency Order Regarding the
23 COVID-19 State of Disaster, and the provisions stated on the
24 record or attached herein.
25

1 that role?

2 A Oh, actually, she's -- she just started, actually, so
3 just this year, so she wouldn't have -- yeah, but she still has
4 information.

5 Q She would have the information, the historical
6 information, from '18?

7 A Yes.

8 Q Okay. Would you say it was as -- you had a
9 successful canvassing and get-out-the-vote operation this
10 time?

11 A What -- what year?

12 Q This year, this primary. Was it successful?

13 A It could have been -- it wasn't as successful,
14 because there was too much confusion created with SB1.

15 Q Okay. Did you -- did you witness any reduction in
16 the number of staff or volunteers that were willing to do these
17 activities?

18 A There was a reduction.

19 Q Okay. From what to seven?

20 A The reduction was in -- in assisting, to have it be
21 more successful in assisting voters.

22 Q Okay. Then -- and I -- I thought we were talking
23 about get-out-the-vote operations. Do you consider
24 assistance --

25 A That's part --

1 there is all kinds of reasons as to why we would have more or
2 we would have less.

3 Q Okay. I understood that, but I'm asking you to
4 compare the primary election in 2018 to the primary election in
5 2022. And you've told me that you can't tell me how many
6 people served as assisters in 2022.

7 A Uh-huh.

8 Q And so I'm asking you, can you tell me how many
9 served either as an employee or volunteer assister in 2018 at
10 the March primary?

11 A Well, at that time, we had many more, because even I
12 was one of them. This year I was not. And we have -- and we
13 would have definitely had more. We didn't have as many this
14 year because we were very concerned about the implications
15 of -- I think there is -- there was a -- criminal penalties
16 now. Because I -- I helped people, I would take the oath. And
17 now apparently there was something else added that -- that had
18 criminal penalties.

19 Q Okay. So just so your testimony is clear, though,
20 you think it was more?

21 A I know it was more.

22 Q Okay. But my question is, as far as you being able
23 to tell me how many there were in '22 and 2018, you can't do
24 that? You don't know that answer?

25 A If you want the -- a number -- you want a number, but

1 Q And what was her last name? The lady's name that
2 helped, that did do it -- that did work this year? You just
3 said --

4 A Rocha, Cris. Oh, you have that name down.

5 Q Okay.

6 A Yeah. Who was it? Who else was it that helped? Oh,
7 Marta Sanchez. She helps. Also, I'm trying to, yeah, just
8 think how we lined them up and then who takes -- because we
9 take, like, a group. I'll help this one, you help this one,
10 you help this one. We have more. I just can't think of
11 them.

12 Q Okay. Have you told me everybody you can remember
13 right now?

14 A Yes.

15 Q Okay. And how many is that?

16 A One, two, three.

17 Q Okay. And you're saying that those three, including
18 yourself -- are you one of the three?

19 A I am.

20 Q Okay. Those three, based on your conversations with
21 them, or your own knowledge.

22 A Yes.

23 Q That the sole reason that they are not serving as
24 assisters this year is based on the provisions of SB1 related
25 to assisters?

1 A You are correct.

2 Q All right. And you said that there is somewhere we
3 could look. If we wanted to look to see how many assisters you
4 used in the primary of 2018 and how many used in the -- in the
5 primary of 2022, there is a document that would show that,
6 correct?

7 A I don't know. I don't know if there is a document,
8 but I could ask the staff. We have the same folks helping.

9 Q Okay. And did you ask about that document before the
10 deposition today?

11 A No.

12 Q Okay. Did you go back and review figures from '18
13 and how many assisters were used during that time? No?

14 A No.

15 Q Okay. Is there a reason you didn't go back and do
16 that research?

17 A I didn't have your questions, I guess.

18 Q Okay. I mean, you did have the topics, though,
19 right? You had the topics to the corporate rep?

20 A Right.

21 Q Okay. And --

22 A But here they didn't ask me names or they didn't ask
23 me --

24 Q Okay. And if we can go to paragraph 165.

25 A Okay.

1 choice?

2 A There it was about -- it's about our voters, our
3 members, asking me or asking one of -- one of our staff to
4 assist them and ask -- this time having to say -- we're sort of
5 worried because somewhere in there it talks about civil
6 penalties and that we could go to jail if we -- if we didn't
7 understand correctly or sign the -- the extra -- the extra
8 affidavit. Is it an affidavit? Or the second testimony.
9 Because there was one, and now because of this they have this
10 other one. We only used to sign one, to swear to one. Now
11 there is two documents, right? That's because one of our staff
12 did help people to vote. And -- well, she helped one or two.
13 But she was also worried, so she called me about -- that there
14 was two of them.

15 Q Okay.

16 A So -- so we didn't have that before.

17 Q But you would agree if you follow the -- the rules,
18 which are -- and what you've described --

19 A Uh-huh.

20 Q If you do what you're supposed to do, then
21 you -- there is no issue, correct?

22 A It's confusing.

23 Q Okay.

24 A It -- you know, they give you a few minutes and you
25 read all of it -- they are reading all of that to you and

1 you're swearing. You're not absolutely sure. I'd rather not,
2 right? And that's why I didn't -- I didn't go and help
3 anybody. And if I didn't know and I've been involved in this
4 and it was still confusing, I think that's -- that's why we --
5 we didn't -- we didn't help as many people.

6 Q Okay. Would you agree and -- and in some Election
7 Code provisions -- you've been doing this for a long time?

8 A I have.

9 Q And some Election Code provisions, maybe the first
10 time they're introduced, you know, you're a little unfamiliar
11 but they become more routine and more normal as time goes on
12 and you're familiar with the process, right? That does happen,
13 right?

14 A It does, it does.

15 Q Okay.

16 A But it seems like -- like -- it seems like now
17 that there are more minority voters, for some reason it seems
18 like a threat on some people, and -- and now that more of us
19 vote, they're trying to keep us away from -- from -- from
20 voting.

21 Q And that's -- that's the opinion you have and you've
22 expressed in your lawsuit, right?

23 A Yes, because that's what exists out there.

24 Q Okay. But we have -- just to be clear, you haven't
25 talked to any legislator other than potentially democratic